

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. The Debtors and the Official Committee of Unsecured Creditors appointed in these chapter 11 cases (collectively, the “Parties”)², by and through their counsel, have entered into the *Confidentiality Agreement and Stipulated Protective Order* (the “Confidentiality Agreement”)³ to facilitate and expedite the production, exchange, and treatment of Discovery Materials to be produced or otherwise disclosed in connection with discovery undertaken during these Chapter 11 Cases, including adversary proceedings and contested matters. A proposed form of order (the “Proposed Order”) approving the Confidentiality Agreement is attached hereto as **Exhibit 1**, and a copy of the Confidentiality Agreement is attached as Exhibit A thereto.

2. Pursuant to local rule 9018-1(h) of the Local Rules for the United States Bankruptcy Court for the District of Delaware, counsel for the Debtors submitted drafts of the Proposed Order and the Confidentiality Agreement to counsel for the United States Trustee (the “U.S. Trustee”)

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The Confidentiality Agreement (as defined herein) allows for other parties in interest in these Chapter 11 Cases to accept the terms thereof and be governed accordingly.

³ Terms utilized but not otherwise defined herein shall have the same meanings as ascribed to them in the Confidentiality Agreement.

for review on March 1, 2023. Thereafter, the U.S. Trustee provided certain comments that were incorporated into the Proposed Order and Confidentiality Agreement and has advised that the U.S. Trustee has no objection to entry of the Proposed Order approving the Confidentiality Agreement as attached hereto. In accordance with the Court's electronic order processing procedures, a copy of the Proposed Order shall be uploaded to CM/ECF.

3. Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: March 8, 2023
Wilmington, Delaware

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/s/ Kimberly A. Brown

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